

1 HONORABLE ROBERT S. LASNIK
2
3
4
5
6
7
8

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 UNITED STATES OF AMERICA,
10 Plaintiff,
11 vs.
12 DIRK WALTER TICHGELAAR,
13 Defendant.

Cause No. 21-114 RSL

**MOTION TO FILE
EXHIBIT UNDER SEAL**

Note on Motion Calendar:
March 19, 2024

15
16 Defendant requests entry of an order permitting him to file Exhibit 4 to his
17 sentencing memorandum [Docket no. 38] under seal. The exhibit consists of the
18 psychological report of James Manley PhD and contains private, sensitive
19 information that would be unduly embarrassing and damaging to the Defendant if
20 made available to the public. A copy of the report was previously provided to U.S.
21 Probation. Defense Counsel will furnish a copy of the report to the Government
22 via email.

23
MOTION TO FILE EXHIBIT UNDER
SEAL - 1

Gilbert H. Levy
Attorney at Law
2125 Western Avenue, Ste 330
Seattle, Washington 98121
(206) 443-0670 Fax: (866) 471-6818

1 DATED: March 7, 2024.
2
3
4
5
6
7
8
9

/s/Gilbert H. Levy _____
Gilbert H. Levy, WSBA #4805
Attorney for Defendant

10
11
12
13
14
15
16
17
18
19
20
21
22
23
CERTIFICATE OF SERVICE

I certify that on March 7, 2024, I caused to be electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the attorney(s) of record.

/s/Gilbert H. Levy _____
Gilbert H. Levy, WSBA #4805
Attorney for Defendant